

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOSEPH WHITEHOUSE and)	Civil Action No.: 05-cv-10939 RWZ
SYLVIA WHITEHOUSE,)	
)	
Plaintiffs)	
)	
vs.)	
)	
ACADIA INSURANCE COMPANY,)	
)	
Defendant)	
)	

**DEFENDANT'S MOTION
FOR ENLARGEMENT OF TIME**

NOW COMES Defendant, Acadia Insurance Company, by and through its counsel, Tompkins, Clough, Hirshon & Langer, P.A. and respectfully requests that this Honorable Court grant Defendant an enlargement of time within which to take the deposition of Plaintiff Joseph Whitehouse. In support of this motion, Defendant states as follows:

1. Pursuant to the Court's Order dated August 2, 2007, discovery is to be completed by October 31, 2007.
2. As set forth in Defendant's accompanying Motion to Compel Answers to Interrogatories, Defendant served Plaintiffs with a set of interrogatories on August 7, 2007, yet to this day, Plaintiffs have failed to respond to these interrogatories in any manner.
3. On October 2, 2007, Defendant served upon Plaintiffs a Notice of Deposition for Plaintiff Joseph Whitehouse. The deposition was noticed for Wednesday, October 24, 2007, at 1:00 p.m.

4. Plaintiff's counsel has asked Defendant to reschedule Mr. Whitehouse's deposition. However, the parties' counsel have been unable to arrive at an alternative available date before November 5, 2007.

5. Defendant will be unable to conduct Mr. Whitehouse's deposition before obtaining the preliminary information sought in Defendant's Interrogatories.

WHEREFORE, Defendant moves for a limited extension of the discovery deadline to allow Defendant to take Plaintiff Joseph Whitehouse's deposition within fifteen (15) days after Plaintiffs have fully answered Defendant's Interrogatories.

Dated this 23rd day of October, 2007.

ACADIA INSURANCE COMPANY

By its Counsel:

/s/ Leonard W. Langer

Leonard W. Langer, Esq.

/s/ Marshall J. Tinkle

Marshall J. Tinkle, Esq.

BBO #565513

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CERTIFICATE OF SERVICE

I, LEONARD W. LANGER, Esq., hereby certify that on October 23rd, 2007,
I caused a true copy of the within DEFENDANT’S MOTION FOR ENLARGEMENT
OF TIME to be mailed by First Class Mail, postage prepaid, to Thomas M. Glynn, Esq.,
114 West Foster Street, Melrose, MA 02176, counsel for the Plaintiffs.

By: /s/ Leonard W. Langer
Leonard W. Langer, Esq.